

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

## **STIPULATION OF FACTS**

The United States of America, through its attorneys, Rachelle Aud Crowe, United States Attorney for the Southern District of Illinois, and Laura V. Reppert, Assistant United States Attorney, enters into the following Stipulation of Facts with Defendant:

1. On August 27, 2021, at approximately 4:00 p.m., Defendant and Andrew Brinkley entered First Bank located at 350 River Park Drive, East St. Louis, Illinois, intending to commit a bank robbery. Defendant and Brinkley approached two tellers, A.A. and R.M., working inside the bank. Brinkley handed A.A. a demand note that stated, "I got a bomb strapped to my chest put all the money in or everyone die." Defendant stood nearby Brinkley at R.M.'s teller station.
2. Fearing for his safety, A.A. opened his teller drawer and provided money from the drawer to Brinkley. Both Defendant and Brinkley then turned towards the entrance/exit doors.
3. Ted Horn, the security guard working at First Bank, had moved behind Defendant and Brinkley while they were at the teller counter to see what they

were doing. When Defendant and Brinkley went to exit the bank after obtaining money, Brinkley pushed by Horn and proceeded to the entrance/exit doors first. Defendant retrieved a semi-automatic firearm from his pocket and ran into Horn, putting the gun Horn's head and shooting Horn in the head. Horn died instantly. Defendant then ran out the door.

4. First Bank's deposits are insured by the Federal Deposit Insurance Corporation.
5. Defendant was identified within hours as one of the bank robbery suspects. He was arrested the following day, August 28, 2021, at 1925 North 13<sup>th</sup> Street, Apartment A, St. Louis, Missouri. Defendant's wallet was seized incident to arrest and "bait bills" from A.A.'s teller drawer were found in Defendant's possession.
6. During a search of 1925 North 13<sup>th</sup> Street, Apartment A, agents from the FBI located a satchel on the roof of the apartment that contained a 9mm Ruger pistol. A forensic examiner with the FBI laboratory compared a bullet and cartridge case located at First Bank to the 9mm Ruger, and he determined that the 9mm Ruger pistol fired the cartridge case and the bullet.
7. The demand note was collected by law enforcement and send to the Illinois State Police Crime Laboratory for expedited testing. Forensic Scientist Melissa Gamboe identified a fingerprint on the note suitable for comparison and identified the fingerprint left on the note as belonging to Brinkley.
8. Defendant was Mirandized and interviewed after his arrest and admitted going into First Bank to commit a robbery and obtaining money and also admitting shooting Ted Horn.

9. This stipulation of facts is intended only to provide the Court with a sufficient foundation to accept the Defendant's guilty pleas and is not necessarily an exhaustive account of the incidents.

10. First Bank in East St. Louis is within the Southern District of Illinois.

**SO STIPULATED.**

RACHELLE AUD CROWE  
United States Attorney

Jaylan Quinn  
JAYLAN D. QUINN  
Defendant

Laura Reppert  
LAURA V. REPPERT  
Assistant United States Attorney

Kim C. Freter  
KIM C. FRETER  
Attorney for Defendant

Alexandra M. Burns  
ALEXANDRIA M. BURNS  
Assistant United States Attorney

Talmage E. Newton, IV  
TALMAGE E. NEWTON, IV  
Attorney for Defendant